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June 6, 2008

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20554

Writer's Direct Access
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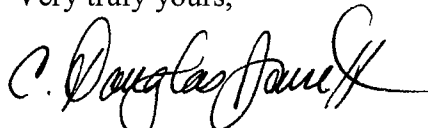
Re: Notice of Ex Parte Communications; MB Docket No. 07-51, Exclusive Service
Contracts for Provision of Video Services in Multiple Dwelling Units and Other
Real Estate Developments--Further Notice of Proposed Rulemaking

Dear Ms. Dortch:

On June 5, 2008, Linda Willey of Camden Property Trust and the undersigned met with
Cristina Chou Pauze' regarding the Further Notice of Proposed Rulemaking in the referenced
proceeding. The points addressed are summarized in the enclosure.

Please contact the undersigned with any questions.

Very truly yours,



C. Douglas Jarrett

Enclosure

cc (w/encl): Cristina Chou Pauze'

Camden Property Trust
Talking Points for Discussion
With Cristina Pauze, Advisor to Commissioner McDowell
June 5, 2008
MB Docket No. 07-51--Further Notice of Proposed Rulemaking

Preferred Resolution

- Terminate inquiry into bulk service arrangements and exclusive marketing agreements, thereby allowing the use of these longstanding arrangements and agreements to continue

Overview of Comments on Bulk Services Arrangements

- Camden, other MDU owners, Verizon, NCTA, and most, though not all, private cable operators (“PCOs”), agree FCC should not regulate/restrict bulk services arrangements

Statutory Support for Bulk Services Arrangements

- Bulk Service arrangements are authorized/contemplated under § 623(d) of the Act (47 USC § 543(d))
- Legislative history evidences Congress’ endorsement for consumer benefits derived from bulk service arrangements in MDUs

Subsection (g) amends § 623(d) of the Communications Act to exempt bulk discounts to multiple dwelling units from the uniform rate requirement. Current Commission regulations require that if a cable operator offers a lower rate in one MDU it must offer the same low rate to MDUs across the franchise area. The Committee finds that this regulation does not serve consumers well by effectively prohibiting cable operators from offering lower prices in an MDU even where there is another distributor offering the same video programming in that MDU.

P.L. 104-104, *Telecommunications Act of 1996*, House Report No. 104-204(I) (July 24, 1995).

Background on Camden Property Trust

- Develop, construct, own and manage high quality residential rental communities—MDUs
 - Long term property ownership and management
 - 60,000 units, approx. 180 residential rental communities
- Recurring rental revenue is primary revenue stream
 - Dependent on maintaining high levels of occupancy

- Residential churn rates in Camden communities---50 to 120%
 - Consistent with data provided to Media Bureau by NMHC and NAA
- Desired services and amenities drive resident satisfaction and occupancy
 - Including high quality, reliable voice, data and video offerings

Bulk Service Arrangements – Residents and Prospective Residents Have Choice

- Camden carefully planned implementation of bulk service arrangements
- During rollouts, residents are not required to accept bulk service arrangement
 - Existing leases are not modified unilaterally
- At time of lease or lease renewal, bulk service is itemized
 - As with balance of services and amenities, residents and prospective residents have option to enter into a lease or elect another community

Bulk Service is Very-Well Received in Camden’s Residential Communities

- Bulk service arrangement is a major market differentiator for Camden
- Existing residents often modify leases to receive bulk service as introduced in a community
- Major selling point for prospective residents

Desired Features of Bulk Service Arrangements

- Cable is “Always On”
 - Highly valued service for residents that move annually or more frequently
- No scheduling installations
- Financial Benefits to Residents
 - No credit qualification with cable operator
 - No security deposit with cable operator
 - Substantially lower rates for desirable programming packages
 - On average 22% savings over retail rate for same programming tier
 - Sometimes discounted premium service is included

Lower Demographic Communities Embrace Bulk Service Arrangements

Lack of Competitive MVPD Offerings to Cable is Reality for Substantial Majority of New and Existing Camden Communities

- Within so-called “competitive markets”
- In metropolitan areas in which ILEC has stated it will not rollout MVPD offering comparable to cable service
 - Phoenix, Denver and Las Vegas